

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MARIA ELENA CHAVEZ LETONA,
Plaintiff,

v.

CASE NO.: 1:23-CV-24299

AMOR DE JESUS CORP., et al.,
Defendants.

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**DEFENDANT JOSE MACHADO’S REPLY TO “PLAINTIFF’S ADDITIONAL
MATERIAL FACTS” [DE71]**

COMES NOW, the Defendant, Jose Machado (“Machado” or “Defendant”) in reply to the Plaintiff, Maria Elena Chavez Letona (“Plaintiff”) “Plaintiff’s Additional Material Facts” (the “Plaintiff’s SOMF”) [DE71] and states as follows:

11. **Undisputed.**

12. **Undisputed.**

13. **Undisputed.**

14. **Undisputed.**

15. **Undisputed.**

16. **Disputed.** Machado was not involved in Amor De Jesus Corp. (“ADJ”). [DE61 p. 6]. Machado maintains that he went inside the business “a couple of times” to “drop off some groceries”. [DE61 p. 6].

17. **Disputed.** Machado maintains that he had no involvement with the operations of ADJ and/or financial affairs of the company. [DE61, p. 7].

18. **Disputed.** While Machado “a couple of times” dropped off groceries at ADJ, during a period spanning several years, he denies that he “regularly” dropped off supplies, groceries, or other goods. [DE61, p. 6-7].

19. **Disputed.** Machado maintains that he was not involved in the business operations of ADJ. [DE61, p. 6-7].

20. **Disputed.** Machado maintains that he only entered the business premises a “couple of times” over a period spanning several years [DE61, p. 6] and that he was gainfully employed with Citibank from 2012 through the pertinent dates at issue. [DE61, p. 4-5].

21. **Disputed.** Machado maintains that he was not involved with the business operations of ADJ and was an owner “on paper” only. [DE61, p. 6-7].

22. **Disputed.** Machado maintains that he was not involved with the business operations of ADJ and was the owner “on paper” only. [DE61, p. 6-7].

23. **Undisputed.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served via EM/ECF on this 10th day of July 2024.

By: Emmanuel Perez
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Fla. Bar # 586552

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